IV. Remarks

Claims 1-15 were previously pending. By this paper, Claims 1-5, 9, and 10 are canceled without prejudice to or disclaimer of the subject matter recited therein.

Claims 6, 8, 11-15 have been amended. No new matter has been added by the amendments.

Reconsideration of Claims 6-8, 11-15 in light of the above amendments and the following remarks is respectfully requested.

Objections to the Specification

The Office Action indicated that the title is not descriptive. The title has been amended to a more descriptive title as stated above.

The Office Action indicated that the specification is objected to as failing to provide proper antecedent basis for the claimed subject matter, namely for the "client device management device". As the examiner indicated that "client device management device" corresponds to the "address storage section 16" in the specification. A corresponding amendment has been made in the specification with this response as shown in above.

Accordingly, Applicants request that the objections to the specification be withdrawn.

Claim Objection to Claim 10, and Claim Rejections to Claims 9 and 10 under 35 USC 112

Claims 9 and 10 have been cancelled herein. The issue that the examiner pointed out concerning "and/or" has been addressed in Claims 8, which now contains the limitation recited in original Claim 9. Accordingly, Applicants request that the claim objection and the §112 rejection of these claims be withdrawn.

Double Patenting

The Office Action indicated that Claims 1-6 were provisionally rejected on the ground of non-statutory obviousness-type double patenting as being unpatentable over Claims 1-5, 7, and 15
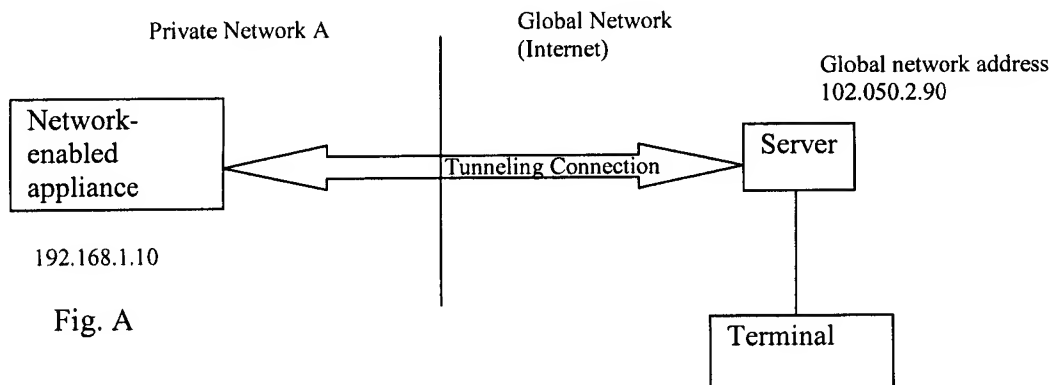
8

of co-pending Application No. 11/596,994. Claims 1-5 have been cancelled herein. A terminal disclaimer will be filed for either this application or Application No. 11/596,994, when one of the two applications receives allowances for any of the pending claims which are provisionally rejected for double patenting.

Objections to the Drawings

The Office Action indicated that the drawings were objected to because "Interbox" as shown in Figure 3A is not clearly described in the specification. Applicants have amended "Interbox" to "Relay device 3" herein. Accordingly, Applicants request that the objections to the drawings be withdrawn.
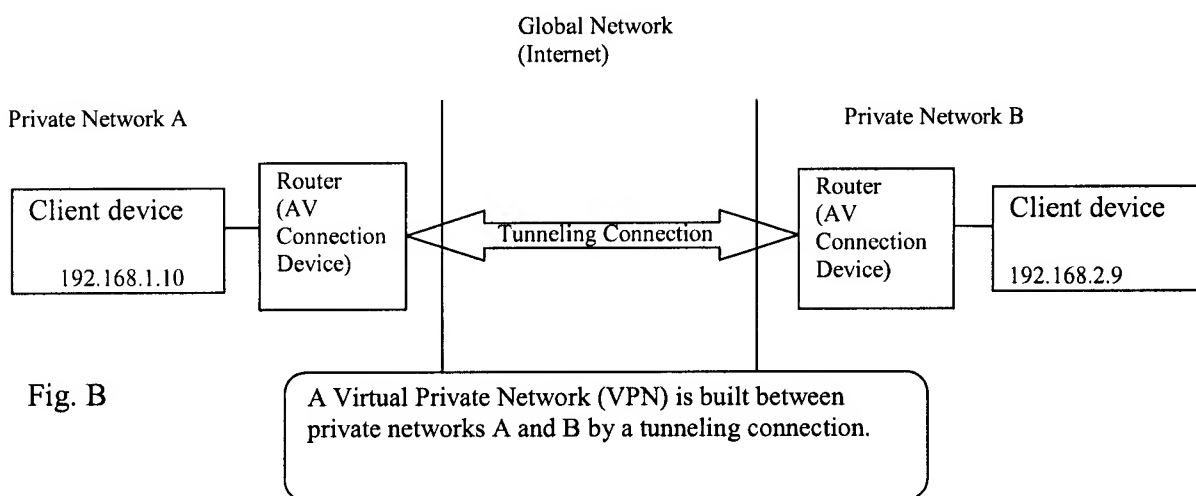
Features of Present Application

As shown in Fig. A below, the appliance of Claim 6 allows a network enabled home appliance connected to a private network to establish a direct tunneling session with a Server on the Internet. This server is not located in a private network, but on a global network (for example, the Internet). Because a tunneling connection is established between the network-enabled home appliance and this Server, the network-enabled home appliance can be uniquely identified and thus remotely controlled from any terminals connected to the Internet, by simply connecting to the Server. This is possible because the network enabled home appliance stores the global network address of the Server in the network enabled home appliance or in the relay device.

Private Network A   Global Network (Internet)

Global network address
102.050.2.90

Network-enabled appliance

Tunneling Connection

Server

192.168.1.10

Fig. A

Terminal

SAITO's invention (U.S. Patent 6,523,696)

On the other hand, in Saito's invention, a tunneling connection is established between two private networks, that is, between their gateways such as routers, in Saito's case, between two AV connection devices. No tunneling session is established between a client device in the first private network and a client device in the second private network. No outside terminal which does not belong to the first or second private network can remotely control any of the devices in the first and second private networks.

Global Network
(Internet)

Private Network A

| Client device | Router (AV Connection Device) |
| 192.168.1.10 | |

Tunneling Connection

Private Network B

| Router (AV Connection Device) | Client device |
| | 192.168.2.9 |

Fig. B

A Virtual Private Network (VPN) is built between private networks A and B by a tunneling connection.

Claim Rejections under 35 U.S.C. §102

The Office Action indicated that Claims 6, 8-9, 11-12, and 15 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,523,696 to Saito et al. ("Saito"). Applicants traverse the rejection.

Claim 6

Amended Claim 6 recites as follows:

> A network-enabled home appliance that is remotely controllable from a terminal connected to the Internet via a server located on the Internet, comprising:
> a control section configured to receive a packet from said server located on the Internet, the packet including a predetermined command, and to control the

network-enabled home appliance based on the command;

a server address storage section for storing a global address of a said server located on the Internet;

a tunneling establishing section for establishing a tunneling connection between the network-enabled home appliance and the server based on the global address of the server; and

a packet processing device for capsulating/decapsulating packets, the packets communicated with the server through the tunneling connection, and routing the packets to the control section or the server.

The examiner, referring to Figs. 7 and 8, and the AV Connection Device of Saito, states that Saito teaches the network-enabled home appliance of Claim 6. However, Claim 6 as amended recites:

a tunneling establishing section for establishing a tunneling connection between the network-enabled home appliance and the server based on the global address of the server.

The AV Connection Device of Saito may act as a collecting and notifying unit of service providing devices information of the first network with respect to the Public network side, but the embodiment of Saito requires two AV Connection Devices, and more importantly no AV Connection Device is installed within individual service providing devices, such as a PC and digital TV. Therefore, Saito does not disclose or teach a configuration in which a direct tunneling connection is established between a network-enabled home appliance and a server on the Internet. Accordingly, Saito fails to disclose each and every element in as complete detail as recited in independent Claim 6.

Claim 8

The server of Claim 8 as amended herein is "a server used on an Internet connection system which comprises a client device, a relay device installed in said client device, and the server". The examiner equates the relay device of Claim 8 with Saito's AV Connection Device; however, none of Saito's embodiments suggests the AV Connection Device being installed in one of client devices such as a PC, digital VTR, or microwave oven. In addition, Claim 8 requires a tunneling establishment section in which a tunneling connection is established between the relay device

installed in a client device and a server on the Internet. Saito only discloses tunneling connections between the first and second AV Connection Devices, and does not disclose such a tunneling establishment section. Therefore, Saito does not disclose a server used on an Internet connection system of Claim 8.

Furthermore, the server of Claim 8 as amended herein additionally recites:

> a model identification section for determining if the client device is of a predetermined model or if the relay device is of a predetermined model; and
> a command conversion section for converting a command to be sent to the client device to a command in a predetermined format for controlling the client device, if the model identification section determines that the client device or the relay device is of the predetermined model.

The above limitations were in original Claim 9. The examiner rejected Claim 9, referring to "1394/IP Service Location Processing Function 226". 1394/IP Service Location Processing Function 226 "searches out a terminal or a service connected to the 1394 bus or receives its registration, recognizes what terminal/service exists on the 1394 bus, and notifies this information to the external whenever the need arises such as when a notification is requested". Saito, Col. 20, lines 26-30. The model identification section of Claim 8 not only determines the model of a client device, but also determines if the client device is of a predetermined model. And the command conversion section converts a command if the model identification section determines that the client device or the relay device is of the predetermined model. Therefore, the 1394/IP Service Location Processing Function 226 of Saito does not teach these features of Claim 8.

Accordingly, applicants respectfully submit that Claim 8 is allowable over Saito.

Claim 11

The examiner rejected Claim 11, referring to a packet filter 2208. However, the packet filter 2208 which functions as a firewall does not disconnect or limit communication based on the determination that a client or relay device is not of a predetermined model. In fact, Saito describes that such restriction is based on the source addresses of packets (column 43, lines 21-30). As explained, Saito does not disclose or teach the server of Claim 11.

For the similar reasons, Applicants submit that Claims 12 and 15 are in condition for allowance.

Accordingly, Applicants request withdrawal of the rejection under 35 U.S.C. § 102(e) over Saito.

Rejections under 35 U.S.C. §103(a) (Saito in view of Tsuchiya)

The Office Action indicated that Claims 1-4, 7 and 10 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,523,696 to Saito et al. ("Saito") in view of U.S. Patent No. 6,118,784 to Tsuchiya ("Tsuchiya"). By this paper, Claims 1-4 and 10 have been cancelled. Applicants respectfully traverse the rejection of Claim 7.

Claim 7

As explained above, applicants submit that Claim 6 is allowable over Saito. Because Claim 7 depends from and further limits Claim 6, Applicants submit that Claim 7 is also allowable as well.

Accordingly, Applicants request withdrawal of the rejection of Claim 7 under 35 U.S.C. §103(a) over Saito in view of Tsuchiya.

Rejection under 35 U.S.C. § 103(a) (Saito in view of Sekiguchi)

Claims 13 and 14 are rejected under 35 U.S.C. § 103(a) over Saito in view of U.S. 6,957,257 to Sekiguchi ("Sekiguchi"). Independent Claim 13 as amended incorporates limitations, similar to those recited in claim 8, that are not taught by Saito. For example, amended Claim 13 recites "a relay device installed in said client device" and "a tunneling establishing section for establishing a tunneling connection between to the relay device and the server." Applicants submit that these features distinguish Claim 13 over the cited portions of Saito and Sekiguchi.

Accordingly, Applicants request withdrawal of the rejection of Claims 13 and 14 under 35 U.S.C. §103(a) over Saito in view of Sekiguchi.

V.   Conclusion

In light of the foregoing, it is believed that all matters set forth in the Office Action have been addressed and that independent Claims 6, 8, 12, 13, and 15 are in condition for allowance. dependent Claims 7, 11, and 14 depend from and further limit the independent claims and, therefore, are allowable as well.

The Examiner is invited to contact the undersigned at the numbers provided below if further consideration is required. Also, Deposit Account No. 08-1394 may be used for any over or under payments.
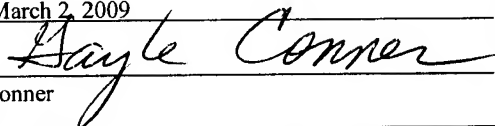
Respectfully submitted,

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I hereby certify that this correspondence is being filed with the United States Patent and Trademark Office via EFS-Web on the following date.

Date: March 2, 2009

Gayle Conner